

August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Cargill, Inc. supports the continued allowance of the following substance(s):

| Name of Substance | Location on National List 205.605(a), 205.605(b), 205.606) | Reason for continued allowance. | Supporting Documents (List any research/ documentation supporting the necessity of using this material or the lack of OG alternatives to this material. Leave blank if you have none. |
|----------------------|--|--|---|
| Yeast-Autolysate | 205.605(a) | Required ingredient for manufacturing. No substitute available. No organic version available | Refer to NOP 205.605. Yeast is defined as a non-agricultural non-organic substance. |
| Yeast-Nutritional | 205.605(a) | Required ingredient for manufacturing. No substitute available. No organic version available | Refer to NOP 205.605. Yeast is defined as a non-agricultural non-organic substance. |
| Enzymes | 205.605(a) | Required ingredient for manufacturing. No substitute available. No organic version available | Refer to NOP 205.605. Enzymes are defined as a non-agricultural non-organic substance. |
| Ammonium Carbonate | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Ammonium Carbonate is defined as a synthetic substance. |
| Ammonium Bicarbonate | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Ammonium Bicarbonate is defined as a synthetic substance. |
| Cornstarch (native) | 205.606 | Required ingredient for manufacturing. | Refer to NOP 205.606. Cornstarch (native) is defined as |

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|-----------------------|------------|--|---|
| | | No organic version available | a non-organically produced agricultural substance |
| Lecithin | 205.606 | Required ingredient for manufacturing. No organic version available | Refer to NOP 205.606. Lecithin is defined as a non-organically produced agricultural substance |
| Pectin (high-methoxy) | 205.606 | Required ingredient for manufacturing. No organic version available | Refer to NOP 205.606. Pectin (high-methoxy) is defined as a non-organically produced agricultural substance |
| Lecithin-bleached | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Lecithin-bleached is defined as a synthetic substance. |
| Pectin (low-methoxy) | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Pectin (low-methoxy) is defined as a synthetic substance. |
| Xanthan gum | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Xanthan gum is defined as a synthetic substance. |
| Citric Acid | 205.605(a) | Required ingredient for manufacturing. No organic version available | Refer to NOP 205.605. Citric Acid is defined as a non-agricultural non-organic substance. |
| Calcium Citrate | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Calcium Citrate is defined as a synthetic substance. |
| Sodium Citrate | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Sodium Citrate is defined as a synthetic substance. |
| Tocopherols | 205.605(b) | Required ingredient for manufacturing. No organic or non-synthetic version available. | Refer to NOP 205.605. Tocopherols are defined as a synthetic substance. |

Sincerely,

Alan Head - Cargill, Inc.

Cc: Organic Trade Association
National Organic Standards Board